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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

ANDY KIM, et al.,

Plaintiffs,

v.

CHRISTINE GIORDANO HANLON, in
her capacity as Monmouth County Clerk,
et al.,

Defendants

Docket No.: 3:24-cv-01098-ZNQ-TJB

CIVIL ACTION

**CERTIFICATION OF
DEBORAH BRAGA**

I, Deborah Braga, do hereby certify that:

1. I am the Deputy County Clerk in the Middlesex County Clerk's Office and accordingly am familiar with the proceedings in the above entitled matter. I make this certification in opposition to the preliminary injunctive relief Plaintiffs request.

2. The Office of the Middlesex County Clerk has consistently interpreted,

that in accordance with N.J.S.A. 19:23-26.1, during United States Senatorial years, all candidates for these offices are eligible to be drawn for the first position.

3. This eligibility is irrespective of whether Senate candidates have chosen to bracket with other candidates.

4. In light of this longstanding interpretation, the United States Senate office has served as Middlesex County's "pivot point". Following this, we proceed to draw for the President and Delegates if there are multiple candidates who are unbracketed with a U.S. Senate candidate, and so forth down the ballot.

5. In the Plaintiff's request for relief, Plaintiff seeks an Order requiring "a separate drawing for every office and candidate."

6. Pursuant to N.J.S.A. 19:23-18, candidates desiring to share the same slogan and be bracketed on the ballot may file a joint petition when multiple seats for the same office are available, and the term of the office is identical. Various offices, such as members of the General Assembly, county commissioners, municipal governing bodies, and, when applicable, county committee members, often file joint petitions.

7. The County of Middlesex is comprised of 615 election districts each of which elects two members of the county committee for each party in a vote for two contest. The upcoming 2024 Primary Election will feature the placement of the Republican County Committee on the official ballot.

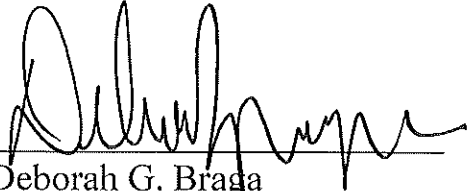
8. In the 2023 Primary Election, 1,208 Democratic County Committee

members filed to appear on the official ballot, resulting in a total of 1,345 candidates, encompassing state, county, and municipal offices.

9. The ballot drawing for the 2023 General Election had the Office of the County Clerk conduct a drawing for 62 candidates, which consumed approximately one hour.

10. It is our concern that requiring a draw for each candidate in each office, particularly for more localized offices and the County Committee positions, would require an excessive amount of time for both conduct and preparation.

I, Deborah Braga, declare under penalty of perjury that the facts alleged in the foregoing are true and correct.



Deborah G. Braga
Deputy County Clerk
Middlesex County